

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major-Draft Permit No. F-03-002

Hillshire Farm and Kahn's

401 Bob Huber Drive

Alexandria, Kentucky 41001

April 16, 2003

Eric Brown, Reviewer

Plant I.D. #: 21-037-00074

Application Log #: 54930

SOURCE DESCRIPTION:

An operating permit application was received from Hillshire Farm and Kahn's on August 2, 2002 and was administratively complete on January 27, 2003. The applicant proposes to operate four (4) indirect heat exchangers. These heat exchangers consist of 3-8.37 MMBtu/hr natural gas-fired units and 1-20 MMBtu/hr natural gas fired unit. The applicant wishes to also operate 2 continuous and 12 batch meat-smoking ovens. The continuous have a 1.65 MMBtu/hr heating rate, while the batch operations have 7-2.75 MMBtu/hr and 5-3.85 MMBtu/hr operations. The source has also agreed to take federally enforceable limitations to preclude applicability of Regulation 401 KAR 52:020. The source will limit its annual throughput tons of wood burned at Emission Points 04 and 12 to 656 tons, as well as limit its annual throughput tons of wood burned at Emission Points 05-11, 13-16, and 18 to 1872 tons respectively.

COMMENTS:

Based on the information provided, the Division concluded that Regulation 401 KAR 59:015 applies to the new boilers that were constructed after 1972. Regulation 401 KAR 59:010, also applies to the ovens and smoke houses.

Emissions were calculated based on AP 42(7/98) table 1-4. The results of the analysis are summarized in the air quality analysis and indicate that the standards will not be exceeded. Since this review has disclosed that all requirements will be met, a preliminary determination that an operating permit may be issued as conditioned, but contingent to the satisfactory resolution of any adverse public comments which might be received. Additional information used in making this review was obtained from existing agreed limitations on file records.

EMISSION AND OPERATING CAPS DESCRIPTION:

The source has also agreed to take federally enforceable limitations to preclude the applicability of Regulation 401 KAR 52:020. The source will limit its annual throughput tons of wood burned at Emission Points 04 and 12 to 656 tons, as well as limit its annual throughput tons of wood burned at Emission Points 05-11, 13-16, and 18 to 1872 tons respectively. Additional operating limitations are set out in Section D of the permit

OPERATIONAL FLEXIBILITY: None

CREDIBLE EVIDENCE:

This permit contains provisions that require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.